

ADEQ FY2011 Air Program Final Report

ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
1	<p>Submit recommendations for Nonattainment Boundary designations for 2010 Ozone NAAQS</p> <p>EPA Comments: 2008 Ozone NAAQS subsumed 2010 Ozone NAAQS; Governor's recommendation letter for the 2008 Ozone NAAQS submitted March 10, 2009. EPA's response issued December 9, 2011; comments and additional information from Arkansas requested by February 29, 2012.</p>	Governor's Letter	<p>TBD based upon 2010 Ozone NAAQS Final Rule</p> <p>ADEQ EOY: No longer required. 2010 Ozone NAAQS suspended.</p> <p>EPA: Ozone NAA designations based on 2008 NAAQS to be finalized April/May 2012</p>
2	<p>Consult with EPA, as necessary, to finalize Ozone Nonattainment Boundary Determinations</p> <p>EPA Comments: 2008 Ozone NAAQS subsumed 2010 Ozone NAAQS; Governor's recommendation letter for the 2008 Ozone NAAQS submitted March 10, 2009. EPA's response issued December 9, 2011; comments and additional information from Arkansas requested by February 29, 2012.</p>	Periodic Planning Calls / Governor's Letter	<p>TBD based upon 2010 Ozone NAAQS Final Rule.</p> <p>ADEQ EOY: No longer required. 2010 Ozone NAAQS suspended.</p> <p>EPA: Ozone NAA designations based on 2008 NAAQS to be finalized April/May 2012</p>
3	<p>Begin drafting Ozone Nonattainment SIP</p> <p>EPA Comments: EPA acknowledges suspension of 2010 ozone NAAQS. Timing for SIPs expected to be proposed in 2012.</p>	Periodic Planning Calls / EOY Review	<p>9/30/11</p> <p>ADEQ EOY: No longer required. 2010 Ozone NAAQS suspended</p>

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4	<p>Continue to work with EPA on issues related to submitted regional haze SIP.</p> <p>EPA Comments: EPA's proposed partial approval/partial disapproval was finalized 02/13/12. ADEQ is encouraged to work with EPA to revise the disapproved portions of the RH SIP and submit to EPA a revised approvable SIP, such that EPA can approve before the FIP clock expires. Otherwise EPA would be required to promulgate a FIP for the disapproved portions of the RH SIP.</p>	Periodic Planning Calls	<p>Ongoing</p> <p>ADEQ EOY: Response to FR Notice of Approval/disapproval due 12/22/11 2/13/12</p>
5	<p>Work with EPA to address any issues raised related to submitted "Threshold Revision" SIP</p> <p>ADEQ EOY: ADEQ believes it has addressed all issues known to EPA and is awaiting action by EPA on this submittal.</p> <p>EPA Comments: We will contact ADEQ as necessary when we begin working on the SIP.</p>	Periodic Planning Calls	Ongoing

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6	<p>Submit draft, proposed, and/or final SIPs, equivalency demonstrations, and/or delegation requests, as necessary.</p> <p>ADEQ EOY: GHG Tailoring Rule regulation changes to Regulations. 18, 19, and 26 have been drafted. ADEQ did not meet May 16, 2011, deadline for incorporation of PM2.5 in PSD program, but is working on revisions Regulation 19 in response to revisions to NSR rules.</p> <p>EPA Comments: AR will stay under the GHG PSD FIP until EPA has approved the AR GHG Tailoring Rule regulations. We encourage ADEQ to submit the GHG Tailoring Rule regulations as expeditiously as possible.</p> <p>On 02/09/12 EPA proposed a partial disapproval of the AR Infrastructure SIP for PM2.5. Upon finalization of this rulemaking, EPA will start the statutorily mandated FIP-clock for the implementation of PM2.5 for PSD. We encourage ADEQ to adopt and submit the PM2.5 PSD rules as expeditiously as possible to avoid the implementation of a PM2.5 PSD FIP in the future.</p>	Submission to EPA	Ongoing / Within timeframes specified in CAA / federal rules
7	<p>Develop a schedule for adoption of rules, submittal of negative declarations, or requests for delegation of Hospital/Medical/Infectious Waste Incinerators, CISWI and small Municipal waste combustion units.</p> <p>ADEQ EOY: EPA has the appropriate letter for review.</p> <p>EPA Comments: Arkansas has provided a letter regarding the approach of using Title V to address landfills. EPA has concerns and will respond in writing. We will need a schedule to address these categories.</p>	Periodic Planning Calls / EOY Review	9/30/11

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8	<p>Continue to work with EPA to resolve outstanding issues in regard to ADEQ's 2010 submitted Negative Declaration for MSW Landfills.</p> <p>EPA Comments: Thank you for the State's commitment and discussions to resolve outstanding issues.</p>	Periodic Planning Calls / EOY Review	<p>9/30/11</p> <p>ADEQ EOY: Ongoing discussion at administrative level</p>
9	<p>Submit revisions to the SIP rules, as necessary, within time frame allowed by federal rules.</p> <p>ADEQ EOY: See item #6 above re: regulations being drafted for PM 2.5 implementation, etc.</p> <p>EPA Comments: See comments for item #6.</p>	SIP Submittal	As needed / Within timeframes specified in CAA / federal rules
10	<p>Implement applicable requirements of the approved SIP</p> <p>ADEQ EOY: Ongoing to date</p> <p>EPA Comments: Thank you for the State's continuing work and progress on SIP implementation.</p>	Periodic Planning Calls / EOY Review	Ongoing
11	<p>Participate in the Blue Skyways Collaborative, its Task Forces, Technical Workgroups, meetings, and projects, among others</p> <p>ADEQ EOY: The Division participates in Blue Skyways webinars and conference calls when available.</p> <p>EPA Comments: We appreciate your continuing participation in Blue Skyways Collaborative activities.</p>	EOY Review	Ongoing

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12	<p>Review and concur on conformity determination revisions for non-attainment and maintenance areas for transportation related criteria pollutants (e.g., ozone, CO, PM2.5, PM10).</p> <p>ADEQ EOY: ADEQ works with West Memphis MPO on appropriate conformity determinations as needed.</p> <p>EPA Comments: No conformity determinations were developed in Arkansas during FY2011. Thank you for the State's commitment to the interagency consultation process.</p>	Conformity determination	As necessary
13	<p>Review air quality reports and take appropriate actions dealing with new areas violating attainment of any of the NAAQS.</p> <p>ADEQ EOY: No new areas are to be designated nonattainment of any NAAQS.</p> <p>EPA Comments: Thank you for your work to ensure that the NAAQS are maintained.</p>	Periodic Planning Calls / EOY Review	Ongoing
14	<p>Consult with and provide assistance to transportation agencies in maintenance areas and review transportation plans to ensure compliance with the SIP.</p> <p>ADEQ EOY: ADEQ works with West Memphis MPO on appropriate review of transportation plans as needed.</p> <p>EPA Comments: We appreciate your commitment to the transportation conformity interagency consultation process.</p>	Participation in interagency consultation process	As necessary

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15	<p>Participate in consultation and evaluation of project-specific emissions, in accordance with general conformity requirements</p> <p>ADEQ EOY: ADEQ participates with West Memphis MPO in evaluation of project specific emissions as needed.</p> <p>EPA Comments: Thank you for the State's commitment to the general conformity interagency consultation process.</p>	Participation in interagency consultation process	As necessary

ADEQ Item #	Monitoring Activity	Output/Reporting Mechanism	Time Frame
16	<p>Report real time ozone to AirNOW for cities required to report the AQI (state/local only).</p> <p>ADEQ EOY: Ongoing, target met</p> <p>EPA Comments: Thank you for supporting the AirNOW system.</p>	AirNOW	Ongoing [present target is within 20 minutes; long-term goal is 5 minutes]
17	<p>Notify 6PD-Q prior to establishing, modifying, relocating, or discontinuing any monitor and/or site.</p> <p>ADEQ EOY: Ongoing, as needed.</p> <p>EPA Comments: The 2011 annual network plan notified Region 6 of requested changes to their network. Region 6 appreciates ADEQ notifying us in a timely manner for any changes to a monitor or site.</p>	Letter	30 days prior to change

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18	<p>Conduct quarterly QA checks for flow rates of PM_{2.5}speciation monitors. Target is for 75% completeness.</p> <p><u>ADEQ EOY: Ongoing, target met.</u></p> <p><u>EPA Comments:</u> We appreciate your work to meet the requirements for the PM2.5 speciation network. Thank you for conducting QA checks for flowrates for PM monitors. Monitors average completeness for PM10 and PM2.5 was greater than 75%.</p>	AQS	Quarterly
19	<p>Consider expanding air quality reporting and forecasting to additional cities, including particle pollution forecasting.</p> <p><u>ADEQ EOY: AQI reported for LR MSA and Springdale/Fayetteville MSA</u></p> <p><u>EPA Comments:</u> We appreciate your support for the AirNOW system.</p>	AirNOW	Ongoing
20	<p>Certify 2010 NAAQS pollutant data in AQS and provide supporting documentation (state/local only, unless tribal work plan requirement).</p> <p><u>ADEQ EOY: Date certified: 3/31/11</u></p> <p><u>EPA Comments:</u> We received the documentation on March 16, 2011 and appreciate your timely submittal.</p>	Letter with appropriate AQS reports	07/01/11

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ADEQ Item #	Monitoring Activity	Output/Reporting Mechanism	Time Frame
21	<p>Submit 2012 annual network plan required by 40 CFR § 58.10. The plan should address new applicable NAAQS monitoring requirements.</p> <p><u>ADEQ EOY: Network review submitted on time.</u></p> <p>EPA Comments: We received the documentation on June 30, 2011 and appreciate the opportunity to discuss the draft annual network plan prior to posting the document on June 1, 2011. In the future, please submit a final hard copy of the annual network plan.</p>	Network Assessment	07/01/11 (or as determined by alternate approved schedule)
22	<p>Produce quality data and submit updated Quality Management Plan and Quality Assurance Project Plans annually.</p> <p><u>ADEQ EOY: QMP approved March 2011, QAPP under review.</u></p> <p>EPA Comments: The QMP was approved March 13, 2011. We appreciate ADEQ's partnership with us to finalize the Pb monitoring sections during the revision process. We look forward to working with ADEQ to address any revisions to the QAPP.</p>	QMP and QAPP's	Annually; various dates (one year after approval date)
23	<p>Submit all monitoring data including criteria and QA to AQS, according to schedule in 40 DFR Part 58. The target data completeness rate is 75% of the potential concentration values based on the operating EPA-funded state/local monitors and their sampling schedule. Target for QA data is 75% of checks required by 40 CFR 58.</p> <p><u>ADEQ EOY: Ongoing, target met.</u></p> <p>EPA Comments: Confirmed. ADEQ submits criteria and QA data to AQS according to schedule. The monitors' average completeness was greater than 75% for the FY'11.</p>	AQS	<p>Quarterly, no later than 90 days after the end of the calendar quarter</p> <p>CY 10 Q3 12/31/10 CY 10 Q4 03/31/11 CY 11 Q1 06/30/11 CY 11 Q2 09/30/11</p>

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ADEQ Item #	Monitoring Activity	Output/Reporting Mechanism	Time Frame
24	<p>Notify EPA Region 6 of any situation (such as monitor malfunction or data validation issue) that results in missing continuous data of more than 120 consecutive hours or two consecutive non-continuous samples and identify the corrective action taken to minimize the loss of data.</p> <p><u>ADEQ EOY: Ongoing.</u></p> <p>EPA Comments: For FY'11, there have not been any notifications for missing continuous or non-continuous data.</p>	Letter or Email	As soon as possible, but no more than 14 days after the event
25	<p>Work with Region to resolve any backlog of flagged critical review records or exceptional events, as necessary.</p> <p><u>ADEQ EOY: As needed.</u></p> <p>EPA Comments: For FY'11, there have not been any exceptional events submitted to the Region. We did not note any flagged data for FY'11.</p>	Conference calls	Quarterly
26	<p>Implement remaining requirements addressed in the 2011 annual network plan associated with NCore so that each station is ready for full operation by January 1, 2011.</p> <p><u>ADEQ EOY: Ok, target met.</u></p> <p>EPA Comments: We commend ADEQ's continued partnership to finalize the Pb and PM Coarse monitoring and collocation requirements.</p>	End-of-year review	Ongoing

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ADEQ Item #	Monitoring Activity	Output/Reporting Mechanism	Time Frame
27	<p>Operate monitors for NAAQS pollutants, PM_{2.5} speciation, and PAMS according to 40 CFR Part 58, approved monitoring plans, and/or grant agreements including QMPs and QAPPs.</p> <p>ADEQ EOY: Ongoing.</p> <p>EPA Comments: ADEQ monitors for NAAQS pollutants according to the requirements. Thank you for your work to meet this commitment.</p>	End-of-year review	9/30/11
28	<p>Report data from operational NCORE multi-pollutant precursor gas monitoring sites to AQS.</p> <p>ADEQ EOY: Ongoing.</p> <p>EPA Comments: NCORE data for the first two quarters of 2011 was reported to AQS. We appreciate your work to finalize the parameters for AQS.</p>	End-of-year review	9/30/11

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ADEQ Item #	Permitting Activity	Output/Reporting Mechanism	Time Frame
29	<p>Submit PSD permits, including major modifications, electronically to EPA Region 6, and NSR minor source permits as requested by EPA.</p> <p>ADEQ EOY: Ongoing</p> <p><u>EPA Comments:</u> ADEQ has met this commitment.</p>	As requested	Ongoing
30	<p>Respond to EPA's concerns on implementation of NSR program.</p> <p>ADEQ EOY: Ongoing</p> <p><u>EPA Comments:</u> ADEQ has met this commitment.</p>	Monthly conference call	Within 90 days of notice from EPA
31	<p>Issue 78 % of major NSR permits within one year of receiving a complete permit application.</p> <p>ADEQ EOY: Ongoing</p> <p><u>EPA Comments:</u> ADEQ has met this commitment.</p>	End-of-year review	09/30/11

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ADEQ Item #	Permitting Activity	Output/Reporting Mechanism	Time Frame
32	<p>Provide timeliness data on NSR permits issued for new major sources and major modifications by entering data including "the application accepted date" and "the permit issuance date" in to the RBLC national database.</p> <p>ADEQ EOY: Ongoing. Timeliness data is provided in TOPS reports. There is no "application accepted date" in the RBLC; ADEQ will use "application received date".</p> <p>EPA: ADEQ met this commitment. The state implements a merged NSR and Title V permitting program, and TOPs reporting is sufficient for timeliness data.</p>	End-of-year review	09/30/11
33	<p>Issue NSR permits consistent with CAA requirements and enter BACT/LAER determinations in the RBLC. Provide EPA 30 days notification for review of the Draft permits. Respond to EPA's concerns prior to issuing the final permit.</p> <p>ADEQ EOY: Ongoing. EPA concerns are addressed in Response to comments.</p> <p>EPA: ADEQ met this commitment.</p>	http://mapsweb.rtpnc.epa.gov/RBLCWebbd/bb102.htm	BACT/LAER database entry within 30 days of final permit issuance.
34	<p>Provide PSD and nonattainment applications, minor source permits as requested by Region, and draft permits to EPA.</p> <p>ADEQ EOY: Ongoing</p> <p>EPA: ADEQ met this commitment.</p>	Copy of applications and draft permits	As required

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ADEQ Item #	Permitting Activity	Output/Reporting Mechanism	Time Frame
35	<p>Make case by case MACT determinations for all applicable sources under Section 112(g), including appropriate compliance monitoring measures, as appropriate</p> <p>ADEQ EOY: Ongoing</p> <p>EPA: ADEQ met this commitment.</p>	Implement 40 CFR 63 process requirements	As appropriate

ADEQ Item #	Emission Inventory Activity	Reporting Mechanism	Time Frame
36	<p>Submit the 2009 State-wide emission inventories for criteria pollutants required by EPA's air emission reporting requirements, via CDX, for large point sources.</p> <p>EPA Comments: Thank you for your timely submittal to the NEI.</p>	Submittal to NEI	<p>06/01/11</p> <p>ADEQ EOY: Submitted 10/8/10</p>

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ADEQ Item #	Emission Inventory Activity	Reporting Mechanism	Time Frame
37	Submit available 2009 toxics inventories for large point sources via CDX. EPA Comments: Thank you for your timely submittal of toxics data.	Submittal to NEI	06/01/11 ADEQ EOY: Submitted 10/8/10
38	Review and quality assure the integrated 2007 NEI for Hazardous Air Pollutants (HAP) and Criteria Air Pollutants (CAPs), as appropriate. Review and quality assure data for the National Air Toxics Assessment EPA Comments: Thank you for your timely review and submittal of corrections.	End-of-year review ADEQ EOY: The NATA was reviewed and some corrections were submitted to EPA.	09/30/11 ADEQ EOY: Several revisions were made to the 2008 NEI for inclusion in the 2008 NEI versions 1.5 and 2.0.
39	Quality assure, validate, and revise NEI facility data using EIS components. EPA Comments: Thank you for your ongoing emissions inventory work.	End-of-year review	09/30/11 ADEQ EOY: Ongoing

ADEQ Item #	Enforcement/Surveillance Activity	Output/Reporting Mechanism	Time Frame
40	Submit a Compliance Monitoring Strategy or an update to the strategy, including the number of Major and 80% SM sources. EPA Comments: Agree. ADEQ submitted the FY2011 CMS Plan on 11/2/10.	Letter	Annually ADEQ EOY: Completed for FY 2012

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41	<p>Complete the universe of planned inspections / document findings consistent with the compliance monitoring strategy (CMS). Include:</p> <ul style="list-style-type: none"> Identify universe of Majors and 80% SM Complete other compliance monitoring inspections (e.g. PCEs) <p>ADEQ EOY: T5- 210, SM-80's – 531 2011 Full compliance Evaluations: T5 -148 which is 70.4% of universe requirement of 50%. SM-80's -352 which is 66.3% of universe requirement of 20%</p> <p>EPA Comments: According to the EOY numbers that R6 generated, ADEQ conducted more FCEs at Title V Majors, which is commendable. ADEQ inspected 162 of 210 Title V Majors (77%) – requirement is 50%. Agree with SM80 number and percentage inspected.</p>	AFS / Inspection Reports	Data input Monthly ADEQ EOY: Ongoing
42	<p>Report High Priority Violations to EPA in a timely manner consistent with HPV Policy.</p> <p>ADEQ EOY: AFS/HPV monthly Review database to ensure minimum – completed Review CMR's to ensure accurate – completed</p> <p>EPA Comments: Agree</p>	HPV conference call	Monthly ADEQ EOY: Ongoing
43	<p>State compliance monitoring and enforcement actions are conducted in accordance with federal minimum standards, state law and regulations.</p> <p>EPA Comments: Agree.</p>	As required	Ongoing ADEQ EOY: Ongoing

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44	<p>Enter all required and accurate data (minimum data requirements) into AIRS consistent with the October 1, 2005 Source Compliance and State Action Reporting (SFB83 Supporting Statement) (Attachment C):</p> <p>Review Database to ensure minimum data requirements are being entered into AFS</p> <p>Review CMRs to ensure accurate minimum data requirements are being offered into AFS</p> <p>ADEQ EOY: AFS/HPV monthly</p> <p>Review database to ensure minimum – completed</p> <p>Review CMR's to ensure accurate – completed</p> <p>EPA Comments: Agree.</p>	AFS/HPV conference call	<p>Monthly</p> <p>Ongoing</p> <p>ADEQ EOY: Ongoing</p>
45	<p>Enter all required TV annual compliance certification information, including date due, date received, date reviewed, whether deviations were reported (Y/N), and compliance status, into AIRS.</p> <p>EPA Comments: Agree.</p>	AFS	<p>Monthly</p> <p>ADEQ EOY: Ongoing</p>

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ADEQ Item #	Fayetteville Shale Region Special Project	Output/Reporting Mechanism	Time Frame
46	<p>Continue performing emissions inventory and ambient air monitoring in the Fayetteville shale region as described in the FY 10 project proposal and QAPP.</p> <p><u>EPA Comments:</u> We received the final project report January 24, 2012.</p>	Final report and data collection as described in the QAPP	<p>9/30/11</p> <p>ADEQ EOY: Submitted and approved</p>